155

27.080 McDonnell Douglas Aircraft
(Tract I)

file

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director

STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Divisionof Parks, Recreation,
and Historic Preservation

December 28, 1990

L.O.W. #90-SL.086

Mr. Joe Haake
McDonnell Douglas Corporation
P. O. Box 516
St. Louis, MO 63166
0801800

Dear Mr. Haake:

Enclosed, please find a report of a hazardous waste management inspection conducted by Mr. Bob Carlson. Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection. The "RECOMMENDATIONS" outline the steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than January 28, 1991. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Mr. Carlson. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck
Regional Administrator

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JAN 02 1991
WASTE MANAGEMENT PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

RSPE/BC/pc

Enclosure

cc: Waste Management Program

RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

McDonnell Douglas Aircraft
140 McDonnell Boulevard
St. Louis, MO 63166
(314) 895-5240

EPA ID #: MOD000818963
MO Generator ID: 01001
Permit #: 0S0062284002
Transporter: H-1039
Resource Recovery: RR-268
Classification: U

Participants

Department of Natural Resources (MDNR)	Mr. Bob Carlson Environmental Specialist St. Louis Regional Office
McDonnell Douglas Aircraft (McAir)	Mr. Joe Haake Section Manager Environmental Compliance Department

Introduction

On December 14, 1990, an inspection of the above-referenced facility was conducted to assess compliance with regulations pursuant to the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management Law. The inspection covered waste management practices, and was conducted under the authority granted by Sections 260.375(9) and 260.377 RSMo.

Facility Description

McDonnell Douglas Aircraft (Tract I) is a manufacturer of military aircraft and related systems and components. Hazardous wastes are generated from a wide variety of manufacturing and service operations, including painting, plating, resin coating, fueling, explosives handling, and laboratory testing.

The McAir complex is a fully permitted storage facility, with a container storage area and several storage tanks for various wastes. In addition to storing wastes generated onsite, the facility transports, bulks and stores wastes from McDonnell Douglas generators in St. Louis City and County and at Second and Morgan streets in St. Charles. McAir is the only licensed transporter of the local McDonnell Douglas facilities, and serves McDonnell Douglas generators only.

McAir also has two certified resource recovery operations. The first involves reclaiming the perchloroethylene (PCE) carrier from a polymer-coating operation. PCE is captured in a fume hood as it evaporates and carbon absorbed. The carbon is then steam stripped, separated from the water, and containerized for resale to the polymer manufacturer.

The second resource recovery process involves the distillation of methyl ethyl ketone (MEK) from spent solvents. Three stills are used for this purpose in different buildings.

A permitted solid waste incinerator also is operated at the McAir facility.

Unsatisfactory Features

A drum of chlorinated waste oil (handled as F001) was in poor condition, in violation of 10 CSR 25-7.264(1), incorporating by reference 40 CFR 264.171.

Comments

The inspector met with Mr. Haake in his offices at Building 80, 4010 North Lindbergh Boulevard. Permit documents were examined. This was followed by a thorough tour of the facility, which focused on waste storage and handling, and ancillary equipment. Among items inspected were the container storage area, the underground and above-ground storage tanks, the wastewater treatment system, the explosives storage building, the resource recovery operations, and the PCB storage area.

All records were found to be in order. The facility contingency plan was being updated at the time. Training records were current and complete. Manifests showed no errors and the "third third" land disposal notifications were being used.

One drum of chlorinated waste oil in the container storage area was in poor condition, showing a large dent as if impacted by a pointed object. No leakage was noted. In addition, one boxed 5-gallon carboy had a missing label, although a loose label on the ground adjacent to the pallet was apparently the correct one. Such problems had been noted in the daily and weekly inspection reports properly, although the dented drum should have been overpacked immediately.

All other facility operations were in good order. The faulty leak-detection probes for the underground jet-fuel storage tanks had been replaced; however, some problems remained. Mr. Haake indicated readings showing the presence of oil and water, which he said were due to infiltration by ground water and hydrocarbons from fuel spillage in previous decades. All the tanks have been tested twice in recent months and were shown to be sound.

Recommendations

1. Overpack the drum of chlorinated waste oil, or transfer the contents to a sound drum.

2. Inspect drums more carefully in the future to detect potential failures.

Should you have any questions regarding this report, please contact the St. Louis Regional Office.

Prepared by:

Bob Carlson
Environmental Specialist

BC/pc

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY

PERMITTED FACILITY CHECKLIST

Name of Facility: McDonnell-Douglas Aircraft

Date 12-14-90

Address: 140 McDonnell Blvd., P.O. Box 516, Bldg. 221
St. Louis, MO 63166

Missouri I.D. # 01001

EPA I.D. # MOD000818963

Facility Representative: Joe Haake

Transporter? yes, # H-1039

Title: _____

Phone Number (314)

Provide a brief description of the treatment, storage or disposal process, if the process has changed from the description in the permit application.

No major changes, and all have been approved. Spent jet-fuel tanks replaced with new ones, and a spent nitric/HF tank was removed, and contamination in soil cleaned up (still pending final approval for closure.)

List the hazardous wastes, if any, that are not listed in the application or permit but that are found being treated, stored, disposed or recycled: N/A

	Waste	Amount/Month	Kilogram/Month	I.D.#	Disposition
1.					
2.					
3.					
4.					
	Total				

Are the manifest(s) and quarterly summary reports being completed and filed with the Department of Natural Resources at P.O.Box 176, Jefferson City, MO, 65102 as required.

yes ✓ no ____

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WASTE MANAGEMENT PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

The following numbering system incorporates the state and federal citations. The state citations to the regulations appears at the top of each section. The last part of the state citation refers to the part of 10 CFR, the federal regulation. In the column, the federal regulation appears as a period and number, .XX. The more stringent state regulations appear in parenthesis, ( ).

10 CSR 25-5.262 Standards for Generators (General/Standard/Special) Condition ?

.11 Generator's MO and EPA I.D. Numbers .....(✓

(2B) No more than 10 days time between generator and facility signatures.....(✓

(2B2) Serially Increasing shipment number .....(✓

Generator's name, address, phone #.....(✓

All transporters' names, phone #'s, MO and EPA I.D. #'s.....(✓

Designated facility name, address, phone # and EPA I.D. #.....(✓

Proper DOT Shipping Name, Hazard Class and I.D. #.....(✓

Containers, Quantity and Unit Wt/Vol being shipped properly designated.....(✓

(2B6) Proper certification.....(✓

(2B6) Manifests returned within 35 days.....(✓

(2B6) Completed manifests submitted to DNR quarterly.....(✓

.23 Manifest properly signed by generator/transporter/TSD and dated.....(✓

(2D1) Summary Manifests Report submitted to DNR quarterly.....(✓

(2D2) Exception generator report submitted within 45 days.....(✓

.41 Biennial Report.....(✓

.30 Waste stored in proper DOT containers.....(✓

.32 Containers/Tanks labeled "Hazardous Waste" and labeled per proper DOT requirements during storage.....(✓

.33 Placards available for use by transporters.....(✓

(2C) Facility inspected and maintained.....(✓

Ignitable and reactive wastes properly handled.....(✓

Date of accumulation marked.....(✓

Storage less than 90 days (if applicable).....(✓

(2C2) Satellite Accumulation requirements met (if applicable).....(✓

Stored in satellite areas less than 1 year.....(✓

Container marked identifying contents and beginning date.....(✓

Containers kept closed / compatible / good condition.....(✓

Quantities accumulated not exceeding 55 gal. (1 quart acutely hz waste).(✓

CSR 25-7.264(2)(B) General Facility Standard (General/Standard/Special) Condition ?

.12(a) Notice of Hazardous Waste shipment from foreign source.....( ) N/A

(b) Notice of permit when receiving waste.....( ) N/A

.13 General Waste Analysis

(a)(1) Copy of plan on site.....(✓

(a)(3)(i) Plan updated if process(es) change.....(✓

(ii) Analysis repeated if manifest discrepancy.....(✓

(b) Procedures to identify wastes on site including leachate and runoff.....(✓

(c) Procedures to identify wastes from off site.....(✓

Waste Analysis plan up-to-date.....(✓

Identify hazardous wastes handled at the facility including leachate and runoff.....(✓

Means to confirm off-site wastes (manifest discrepancy) and run off.....(✓

.14(b) Security

24-hour surveillance system at facility or.....(✓

An artificial or natural boundary / controlled access.....(✓

Restricted access sign posted at each entrance.....(✓

Legible from a distance of 50 feet.....(✓

.15 General Inspection

(a) Facility inspected and maintained.....(✓

(b)(1) Inspect emergency equipment, security devices, operating and structural equipment.....(✓

(c) Remedied any deteriorated or malfunctioning equipment (check equipment)....(✓

(d) Records of inspections retained.....(✓

.16 Personnel training

(a) Completed classroom or on-the-job training to handle emergencies.....(✓

(a)(2) Trainer qualified in hazardous waste management procedures documented...(✓

(c) Annual review of training.....(✓

(d) Job title, description, and name of person filling position.....(✓

(e) Written record of the type and amount of training given.....(✓

.17 General Requirements for Ignitable, Reactive or Incompatible Wastes

(a) Precautions taken to prevent accidental ignition.....(✓

(b) Precautions taken to prevent reaction.....(✓

(c) Documented methods used.....(✓

.18 Location Standard

(b) Floodplains - plan in place for how facility will remove wastes from areas that could be flooded.....(✓

10 CSR 25-7.264(2)(C) Preparedness and Prevention (General/Standard/Special) Condition ?

.32(a) Internal communication or alarm system.....(✓

(b) Device in the hazardous waste operation area capable of summoning emergency assistance.....(✓

(c) Fire control, spill control, and decontamination equipment available.....(✓

(d) Adequate water supply for fire control equipment.....(✓

.33(a) Adequate and proper safety equipment, available and ready.....(✓

.34 Each person in hazardous waste area able to summon help.....(✓

.35 Adequate aisle space.....(✓

.37 Arrangements with local emergency agencies.....(✓

10 CSR 25-7.264(2)(D) Contingency Plan (General/Standard/Special) Condition ?

.51 Has contingency plan been used successfully.....(✓

.52 Are following items up-to-date -

(a) Detailed description of procedures that personnel must implement in response to fires, explosions, releases of hazardous waste.....(✓

(c) Formal arrangements with emergency services.....(✓

(d) Name, address, and phone numbers (home & office) of emergency coordinator(s)(✓

(e) Emergency equipment including its description and location.....(✓

(f) Evacuation plan.....(✓

.53 Copy of the contingency plan at site.....(✓

.54 Contingency plan need amendments made as necessary.....(✓

.55 Emergency coordinator can commit resources in an emergency.....(✓

.56 Emergency coordinator can explain his responsibilities in emergency situations (Use the exit interview to ask specific questions about possible emergencies at site.).....(✓

Mr. Haake is well-versed in this area

10 CSR 25-7.264(2)E) Manifest System (General/Standard/Special) Condition.....?

.71 Use of Manifest System

For off-site facilities

(a)(1) Manifests signed by generator/transporter/TSD and dated.....(✓

(a)(2) Discrepancy in manifested loads noted.....(✓

(a)(3) Copy to transporter.....(✓

(a)(4) Copy to generator in 30 days.....(✓

(a)(5) Copy at facility for 3 years.....(✓

(c) Use Generator Checklist for waste sent off-site 10 CSR 25-5.262.....(✓

Operating Record

.72(a) Manifest properly signed and dated.....(✓

(b) Completed manifests submitted to DNR quarterly.....(✓

(c) Summary Manifest Report submitted to DNR quarterly.....(✓

(d) Biennial Report.....(✓

.73(a) Description, quantity, and TSD process for all hazardous wastes.....(✓

(b)(1) Location and quantity of all hazardous waste.....(✓

(b)(3) Waste analysis records from off-site sources.....(✓

(b)(4) Summary and description of emergency incidents.....(✓

(b)(5) Record of inspections.....(✓

(b)(6) Monitoring and testing and analytical results on-site if necessary.....(✓

Reporting

.74 Records are kept and available for inspection.....(✓

.75 Quarterly facility reports submitted.....(✓

(2G) Ground water monitoring data on-site/submitted.....( ) N/A

(2H) Certification of information signed.....(✓

.76 Unmanifested waste reports for off-site facilities on-site/submitted.....(✓

.77 Reports for emergencies, spills, closure on-site/submitted.....(✓

10 CSR 25-7.264(2)(F) Ground Water Monitoring (General/Standard/Special) Condition N/A

.90 Monitoring Well Construction

Please describe the casing material and well diameters and locations if different than described in the permit application:_____

_____

_____

Describe the condition and type of protective casing in the monitoring wells if different than described in the permit application:_____

_____

_____

Describe the security measures completed to protect the wells from outside influences if different than described in the permit application:_____

_____

_____

The wells appear structurally sound and there is no failure in the integrity, yes____ no _____ unknown ____

The wells appear tightly sealed at the surface and no pathways exist for surface water to leak into the wells, yes____ no _____ unknown ____

.91(a) Have records been kept of analyses of ground and surface water sampling? yes____ no _____ unknown ____

(F1) Have these records been submitted to EPA/DNR? yes____ no _____ unknown ____

(F5) Can personnel identify surface water sampling points or direction of drainage( )

_____

_____

_____

_____

10 CSR 25-7.264(2)(G) Closure and Post-Closure (General/Standard/Special) Condition ?

.112 There is a copy of the approved closure and post-closure plans onsite.....(✓
Plan is up-to-date.....(✓

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10 CSR 25-7.264(2)(H) Financial Requirements (General/Standard/Special) Condition ?

.140 O/O can produce documents showing compliance with financial requirements for closure, post-closure, and sudden and non sudden liability.....(✓
.143(a) Closure cost estimates are up-to-date.....(✓
(b) Letter of transmittal to MDNR on-site.....(✓
.145(a) Post-closure cost estimates are up to date.....(✓ N/A
(b) Letter of transmittal to MDNR on-site.....( ) N/A
.147 Liability requirements are up-to-date.....(✓

10 CSR 25-7.264(2)(I) Use and Management of Containers (General/Std/Special) Condition ?

.171 Containers in good condition. (all but one, containing Fool chlorinated oil).....(—
.172 Containers made of materials compatible with hazardous wastes placed in them.(✓
.174 Hazardous waste containers storage area inspected once a week and inspection log completed.....(✓
.175 Containment free of cracks; containers elevated; run-on prevented; sump empty; no sign of stains of spilled material.....(✓

.176 Ignitable or reactive waste at least 50 ft. from property line.....(✓
.177(a) Incompatible wastes placed in different containers.....(✓
(c) Containers holding incompatible wastes separated by dikes, or walls.....(✓

(J)(1,) No hazardous waste having a vapor pressure of 78 mm of Hg at 25°C in an open tank .....(✓

,194(a) No hazardous waste shall be placed in tank if it causes a failure.....(✓

,194(b) o/o uses appropriate practices to prevent spills (one of the following)

(1) spill prevention devices.....(✓

(2) overfill prevention devices.....(✓

(3) maintain sufficient freeboard.....(✓

,194 (c) if spill facility complied with 264,196.....(✓

,195 (a) overfill controls inspected.....(✓

,195 (b) the following components are inspected daily

(1) above ground portions of tanks.....(✓

(2) data from leak detection equipment.....(✓

(3) area around tank to check for leaks.....(✓

,195(c) cathodic protection and integrity of tank(s) inspected

(1) within 6 months of installation and annually thereafter.....(✓

(2) all sources of impressed current must be inspected every other month....(✓

,195(d) inspections documented in operating record.....(✓

( ) In compliance ( ) In violation

Inspector's name Bob Carlson

Title Environmental Specialist II

Date 12-14-90

FORM PERMIT-INSPEC (MARCH 1988)

Facility Name: McDonnell-Douglas Aircraft
ID Number: MoD000818963
Inspector: Bob Carlson
Date: 12-14-90

DRAFT

RCRA LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

McDonnell-Douglas Aircraft — 140 McDonnell Blvd.
A. Facility Name. — B. Street (or other identifier)

St. Louis — MO — 63166
C. City — D. State — E. Zip Code — F. County Name

aircraft manufacturer; all kinds.
G. Nature of business; identification of industrial and waste management operations; relevant SIC codes

MOD 000 818 963
H. EPA ID #

Joe Haake, (314)
I. Facility Contact (Name and Phone Number)

II.A. For onsite facilities, complete the generator checklist — Comments

B. General Facility Standards

1. General

a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?
yes

b. Describe the frequency of sampling conducted by the facility.
annual or as needed

2. Treatment Facilities N/A

a. Has the treatment facility revised its waste analysis plan [§268.7(b)] to meet the requirements of §264.13 or §265.13? ___Yes ___No*

(i) Is the treatment facility conducting TCLP tests for wastes specified in Appendix A (i.e., those prohibited wastes subject to treatment standards expressed as waste extracts) per 286.7(b)(i)? ___Yes ___No*

* A potential violation is indicated

Facility Name: McDonnell-Douglas Aircraft
ID Number: MODOOO 818963
Inspector: Bob Carlson
Date: 12-14-90

Comments

(ii) Is the treatment facility using the paint filter test for the California waste residues [§268.7(b)(ii)]? ___Yes ___No

(iii) Is the treatment facility testing the pH of California waste residues? ✓Yes ___No

(iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [§268.7(b)(3)]? ___Yes ___No*

(v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)] ___Yes ___No*

3. Land Disposal Facilities N/A

a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ___Yes ___No*

b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [§268.7(c)(2)]? ___Yes ___No*

c. Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)] ___Yes ___No*

d. Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]? ___Yes ___No*

C. Storage (§268.50)

1. a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ✓Yes ___No

If no, go to "c."

b. Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? ✓Yes ___No*

* A potential violation is indicated

Facility Name: McDonnell-Douglas #1
ID Number: MOD000818963
Inspector: Bob Carlson
Date: 12-14-90

Comments

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [§264.73 or §265.73]? ✓Yes ___No*

d. Do operating records agree with container labeling? [§268.50(a)(2) or §264.73 or §265.73] ✓Yes ___No*

e. Is waste exceeding treatment standards stored for less than 1 year? ___Yes ___No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ___Yes ___No

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year? ___Yes ___No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

_____

D. Treatment in Surface Impoundments (§268.4) N/A

1. Are prohibited wastes placed in surface impoundments for treatment? ___Yes ___No

If no, go to E.

2. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [§268.4(b) and §268.3]? ___Yes* ___No

3. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency [§268.4(a)(4)]? ___Yes ___No*

4. Have the minimum technology requirements been met [§268.4(a)(3)]? ___Yes ___No*

a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]? ___Yes ___No*

* A potential violation is indicated

Facility Name: McDonnell-Douglas Aircraft
ID Number: MOD000818963
Inspector: Bob Carlson
Date: 12-14-90

Comments

5. Have the Subpart F ground-water monitoring requirements been met [§268.4(a)(3)]? ___Yes ___No*

6. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? ___Yes ___No*

7. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ___Yes ___No

8. Provide the frequency of analyses conducted on treatment residues: _____

_____

Does the frequency meet the requirements of the waste analysis plan [§264.13 or §265.13]? ___Yes ___No*

9. Does the operating record adequately document the results of waste analyses performed [§264.13 or §265.13]? ___Yes ___No*

10. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [§268.4(a)(2)(ii)]? ___Yes ___No*

    a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ___Yes ___No

11. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ___Yes ___No

12. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ___Yes ___No

    a. Were these residues subject to a valid 268.8 certification? ___Yes ___No*

13. When removed, were wastes treated prior to disposal? ___Yes ___No

    a. If yes, are waste residues treated on or offsite? ___Onsite ___Offsite

Facility Name: McDonnell-Douglas Aire
ID Number: MOD000818963
Inspector: Bob Carlson
Date: 12-14-90

Comments

b. Identify management method _____

E. Treatment N/A

1. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)?
___Yes ___No

If no, go to "F."

2. Describe the treatment processes, including exempt processes.

3. Does the facility treat soft hammered wastes?
___Yes ___No

a. If yes, is treatment occurring as described in the generator's certification/demonstration [§268.8(c)(1)]? ___Yes ___No*

b. Did the treatment facility certify he treated the soft hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? ___Yes ___No*

c. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [§268.8(c)(2)]? ___Yes ___No*

4. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [§268.7(c)(2)]? ___Yes ___No*

5. Describe frequency of testing of treatment residuals.

6. Was dilution used as a substitute for treatment [§268.3]? ___Yes* ___No

* A potential violation is indicated

Facility Name: McDonnell-Douglas Aviex
ID Number: MOD000818963
Inspector: Bob Carlson
Date: 12-14-96

Comments

7. Are all notifications, certifications, and results of waste analyses kept in the operating record [§264.73(b) or §265.73(b)]? ___Yes ___No*

8. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [§268.7(b)(4) and (5) and §268.8(c)(1)]? ___Yes ___No*

9. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [§268.7(b)(6)]? ___Yes ___No*

F. Land Disposal N/A

1. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments** waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker?) ___Yes ___No

2. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [§§268.7(c)(1); 268.7(a),(b)]? ___Yes ___No*

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)(2)] ___Yes ___No*

   If yes, was the frequency of testing as required by the facility's waste analysis plan [§264.13 or §265.13]? ___Yes ___No*

4. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? ___Yes ___No

   If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][§268.30(d), §268.31(d), §268.32(g), §268.33(e)]? ___Yes ___No*

* A potential violation is indicated
**Do not include SIs addressed under Section "D" of this checklist.

Facility Name: McDonnell-Douglas Corp.
ID Number: MOD000818963
Inspector: Bob Carlson
Date: 12-14-90

Comments

5. Were restricted vastes subject to a national capacity variance or case-by-case extension disposed?
___Yes ___No

   If yes, have the minimum technology requirements been met for all units receiving such vastes [§268.30(c), §268.3ı(c), §268.32(d), §268.33(d)]?
___Yes ___No*

6. Were adequate records of disposal maintained [§264.73(b) or §265.73(b)]? ___Yes ___No*

7. If vastes subject to a nationvide variance, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [§264.73(b) or §265.73(b)] ___Yes ___No*

8. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ___Yes ___No

9. If the owner/operator is disposing of a soft-hammer vaste, is he maintaining the generators and treaters (if applicable) notices and certifications [§268.8(a)(2)-(a)(4)]? ___Yes ___No*

   a. Is the facility disposing of any soft hammer wastes that may be classified as California wastes?
___Yes ___No

   b. Did the facility seek to verify whether these vastes may be subject to all restrictions, e.g., California ban? ___Yes ___No

* A potential violation is indicated

RESOURCE RECOVERY FACILITY CHECKLIST

Name of Facility: McDonnell-Douglas Aircraft Date: 12-14-90

Address: 140 McDonnell Blvd., P.O. Box 516, Bldg. 221
St. Louis, MO 63166

RR #: RR-268 Mo. I.D. #: 01001 EPA I.D. #: mod000818963 Facility Class.: U

Facility Representative: Joe Haake Title:

Is this facility a generator? yes TSD? yes Transporter? yes

Is a copy of the certification maintained at the facility? Yes ✓ No

Is this facility meeting the conditions of their certification? Yes ✓ No

If no, please elaborate.

RECEIVED
JAN 02 1991
WASTE MANAGEMENT
MISSOURI DEPT OF NATURAL RESOURCES

List the wastes that are recovered:

1. waste methyl ethyl ketone (MEK)
2. waste perchloroethylene
3.
4.

Are wastes accepted from off-site sources? Yes No ✓

If yes, please complete Section A. If no, proceed to Section B.

A. MANIFESTS 10 CSR 25-9.010(1)(D)2. N/A

1. Shipments from off-site sources manifested.....( )
2. Manifests properly completed by the generator.....( )
3. Has the operator properly dated and signed the manifest.....( )
4. Generator's manifest returned within 30 days.....( )
5. Does the facility maintain their copy of the manifest for 3 years.....( )
6. Manifest discrepancies noted and actions taken to resolve the discrepancies..( )
7. Time between the generator and facility 10 days or less.....( )

B. RECORDKEEPING and REPORTING 10 CSR 25-9.010(1)(D)2.

8. Facility submitting quarterly report form DNR-HWP-1.....(✓)
9. Non-manifested shipments properly reported.....(✓)
10. Operating Record.....(✓)
11. Facility constructed and operated according to plans.....(✓)
12. If not, have modifications been approved.....(✓)

COMMENTS:

C. STORAGE 10 CSR 25-9.010(1)(D)3., 4. and 5.

13. Storage in secure enclosure.....( )
14. Storage with proper waste confinement.....( )
15. Underground tanks and impoundments constructed with a system for detecting leaks.....N/A.....( )
16. Describe storage of waste and product at the facility, condition of containers, amounts, labeling, segregation, spill prevention, housekeeping, term of storage, etc. no violations noted.
3 MEK stills in different buildings.
Perc. carbon-absorbed + steam-stripped.

E. ADDITIONAL OPERATING STANDARDS FOR R1 AND R2 10 CSR 25-9.010(K) N/A

17. Operator following approved quality control plan.....( )
18. Daily log of wastes received.....( )
19. Daily log of inspection and maintenance.....( )
20. Facility plan to continue operation for the next 6 months.....( )
21. Approved waste analysis being followed.....( )
22. Records of analysis kept on file.....( )

Please describe items such as parameters of analysis, % of shipment analyzed, results of analysis, etc.

Please mark boxes as shown

(✓) In compliance

■ In violation

Inspector's Signature

Title

Office

FORM RR-INSP (Oct 1, '86)